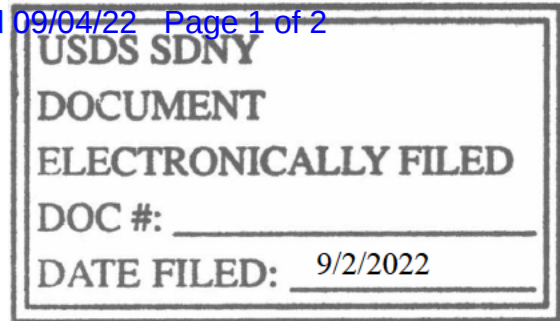




Amadou Kilkeny Diaw
+1 202 346 4191
ADiaw@goodwinlaw.com



MEMO ENDORSED

September 1, 2022

VIA ECF

The Honorable Lewis A. Kaplan
U.S. District Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street
New York, NY 10007

Re: PRCM Advisers LLC, et al. v. Two Harbors Investment Corp., Case No. 1:20-cv-05649-LAK

Dear Judge Kaplan:

We represent Defendant Two Harbors Investment Corp. (“Two Harbors”) in the above-captioned matter. Two Harbors respectfully submits this letter motion (1) to obtain the Court’s approval to seal confidential information about Two Harbors’ internal computer systems provided in Exhibits 18 and 21 filed in connection with Two Harbors’ Letter Motion in Opposition to Plaintiffs’ Letter Motion to Compel (the “Opposition”) and to redact confidential information about Two Harbors’ internal computer systems provided in Exhibits 10, 13-17, and 19-20 and the Opposition.

First, Two Harbors requests to seal Exhibits 18 and 21 that contain confidential information about Two Harbors’ internal computer systems. Exhibit 18 is a compilation of all requests and correspondence related to the inspection. Exhibit 21 contains excerpts of correspondence between J. Breen and K. Patel requesting access to various servers during the inspection. The exhibits filed under seal include sensitive, non-public information concerning Two Harbors’ IT infrastructure, servers, applications, and data that, if disclosed to the public, could compromise the security of the infrastructure, servers, applications, and data.

Second, Two Harbors requests to redact portions of Exhibits 10, 13-17, 19-20 and the Opposition. Exhibit 10 is a letter from K. Patel to A. Diaw dated May 10, 2022, that contains information about certain features of Two Harbors’ internal computer systems. Exhibit 13 is an excerpt of an email from A. Diaw to K. Patel dated June 9, 2022, that contains information about certain features of Two Harbors’ internal computer systems. Exhibit 14 is an excerpt of an email from A. Diaw to K. Patel dated July 19, 2022, that contains information about certain features of, and various servers on, Two Harbors’ internal computer systems. Exhibit 15 is a letter from J. Breen to K. Patel dated August 4, 2022, that contains information about various servers on Two Harbors’ internal systems and information concerning the infrastructure of Two Harbors’ internal systems. Exhibit 16 is a letter from K. Patel to J. Breen dated July 28, 2022, that contains information about various servers on Two Harbors’ internal systems. Exhibit 17 is an email from K. Patel to J. Breen dated July 29, 2022, that contains information about various servers on Two Harbors’ internal systems. Exhibit 19 is an excerpt of an email from A. Diaw to K. Patel dated July 21, 2022, that contains information about various servers on Two Harbors’ internal systems. Exhibit 20 is an excerpt of an email from J. Breen to K. Patel dated August 11, 2022, that contains information



September 1, 2022

Error! No text of specified style in document.

Page 2

about various servers on Two Harbors' internal systems. The Opposition contains information about servers on Two Harbors' internal systems and the infrastructure of Two Harbors' internal systems. The redacted information in these exhibits and the Opposition includes sensitive, non-public information concerning Two Harbors' IT infrastructure, servers, applications, and data that, if disclosed to the public, could compromise the security of Two Harbors' IT infrastructure, servers, applications, and data.

Respectfully submitted,

/s/ Amadou Kilkenny Diaw

Amadou Kilkenny Diaw (**pro hac vice pending*)

GOODWIN PROCTER LLP

1900 N Street NW

Washington, D.C. 20036

202-346-4000

adiaw@goodwinlaw.com

cc: Counsel of record via ECF

So ordered.

/s/ LAK

9/2/2022